

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CONSUMER FINANCIAL  
PROTECTION BUREAU,

Plaintiff,

v.

UNIVERSAL DEBT & PAYMENT  
SOLUTIONS, LLC; *et al.*,

Defendants.

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Civil Action No.  
1:15-cv-0859-RWS

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**CONSENT MOTION FOR EXTENSION OF TIME FOR  
DEFENDANT FRONTLINE PROCESSING CORPORATION  
TO RESPOND TO THE COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendant Frontline Processing Corporation (“Frontline”) respectfully requests, with the consent of Plaintiff, an extension of time through and including Tuesday, May 12, 2015 to file an answer, motion or other responsive pleading in this action. In support of this Consent Motion, Frontline shows the Court as follows:

1. Plaintiff, Consumer Financial Protection Bureau (“Plaintiff”), filed its Complaint in this action on March 26, 2015. (Doc. 1.)

2. Plaintiff served Frontline on April 6, 2015. Frontline’s current deadline to respond to the Complaint is on April 27, 2015.

3. The undersigned was recently retained to represent Frontline, and respectfully requests an extension of time to answer, move, plead, object, or otherwise respond to the Complaint through and including May 12, 2015.

4. Plaintiff consents to Frontline's request.

WHEREFORE, Defendant Frontline Processing Corporation respectfully requests an extension of time through and including May 12, 2015 to answer, move, plead, object, or otherwise respond to Plaintiff's Complaint. A proposed order is attached for the Court's convenience.

Respectfully submitted this 22nd day of April, 2015.

**CONSUMER FINANCIAL  
PROTECTION BUREAU**

/s/ Jonathan B. Engel

Jonathan B. Engel

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*Counsel for Frontline Processing  
Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing **CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT FRONTLINE PROCESSING CORPORATION TO RESPOND TO THE COMPLAINT** using the Court's CM/ECF system, which will send electronic notification of such filing to all counsel of record.

This 22nd day of April, 2015.

/s/ Scott E. Zweigel  
Scott E. Zweigel